

## REMARKS

Applicants respectfully request reconsideration and allowance for the above-identified application. Claims 1-34 remain pending, wherein claims 1, 14, 15, 24 and 30 have been amended and no claims have been added.<sup>1</sup> Claims 1, 14, 24, and 30 are the only independent claims at issue.

Claims 1-34 were rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,816,971 to Dicorpo et al. ("*Dicorpo*") in view of U.S. Patent Publication No. 2003/0084135 to Narain ("*Narain*").<sup>2</sup>

The present invention is generally directed to configuring a computer system to securely communicate with target devices over a network. Claim 1, for example, defines exposing a common interface that may be used to configure any of the plurality of initiators. Next, claim 1 defines receiving an indication through the common interface that a selected initiator from among the plurality of initiators is to be configured to communicate with a selected target device. Next, claim 1 defines retrieving security information from a database that includes information that is relevant to configuring security for any of the plurality of initiators. Next, claim 1 defines identifying a security configuration of the selected initiator using the retrieved security information. Next, claim 1 defines determining that if the identified security configuration were applied to the selected initiator, the applied identified security configuration would not cause the selected initiator to conflict with any of the existing security configurations of the other of the plurality of initiators. Lastly, claim 1 defines upon determining that the identified security configuration would not cause the selected initiator to conflict with any of the existing security configurations of the other of the plurality of initiators, an act of configuring the selected initiator using the identified security configuration.

Claim 14 is a method claim similar to claim 1 that includes functional language. Claim 24 is a computer program product claim corresponding to claim 1. Claim 30 is a computer program product claim corresponding to claim 1.

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<sup>1</sup> Support for the amendments to the claims are found throughout the specification and previously presented claims, including but not limited to paragraphs [0012], [0019], [0035], [0041], [0044] and Figure 2.

<sup>2</sup> Although the prior art status of the cited art is not being challenged at this time, Applicant reserves the right to challenge the prior art status of the cited art at any appropriate time, should it arise. Accordingly, any arguments and amendments made herein should not be construed as acquiescing to any prior art status of the cited art.

All of the pending claims were rejected under 35 USC 103(a) using *Dicorpo* as the primary reference. *Dicorpo* describes a storage system with Logical Unit Number (LUN) virtualization. *Dicorpo* teaches a system capable of managing access to a physical device from among a plurality of initiators. *Dicorpo* further teaches using an interface coupled to a data path between the initiators and the physical device and a controller to resolve conflicting concurrent attempts to access the physical device (col. 4:32-47). Upon receiving multiple concurrent attempts to access the physical device, the virtual device object emulates responses of the physical device and redirects access to the physical device when the physical device becomes available (claim 1).

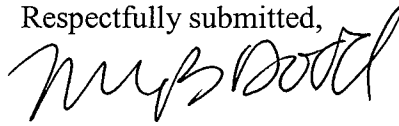
*Dicorpo* fails, however, to teach or suggest determining that if the identified security configuration were applied to the selected initiator, the applied identified security configuration would not cause the selected initiator to conflict with any of the existing security configurations of the other of the plurality of initiators, as recited in claim 1. *Dicorpo* also fails to teach or suggest upon determining that the identified security configuration would not cause the selected initiator to conflict with any of the existing security configurations of the other of the plurality of initiators, an act of configuring the selected initiator using the identified security configuration, as recited in claim 1. At least for either of these reasons Applicants respectfully submit that claim 1 patentably defines over the prior art of record. For at least either of the same reasons, claims 14, 24, and 30 also patentable define over the prior art of record.

In view of the foregoing, Applicants respectfully submit that the other rejections to the claims are now moot and do not, therefore, need to be addressed individually at this time. It will be appreciated, however, that this should not be construed as Applicants acquiescing to any of the purported teachings or assertions made in the last action regarding the cited art or the pending application, including any official notice. Instead, Applicants reserve the right to challenge any of the purported teachings or assertions made in the last action at any appropriate time in the future, should the need arise. Furthermore, to the extent that the Examiner has relied on any Official Notice, explicitly or implicitly, Applicants specifically request that the Examiner provide references supporting the teachings officially noticed, as well as the required motivation or suggestion to combine the relied upon notice with the other art of record.

In the event that the Examiner finds remaining impediment to a prompt allowance of this application that may be clarified through a telephone interview, the Examiner is requested to contact the undersigned attorney.

Dated this 9<sup>th</sup> day of November, 2006.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "R. Nydegger", written in a cursive style.

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